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THOMAS D. SANGREY and

IN THE

AIMEE I. SANDGREY, his wife

CIRCUIT COURT

Complainants

FOR

VS.

HOWELL C. HAPP, JR., and SHIRLEY L. HAPP, his wife FREDERICK COUNTY

MARYLAND

Defendants

EQUITY NO. 26,050

AMENDED ANSWER TO BILL OF COMPLAINT TO QUIET TITLE

Now comes Howell C. Happ, Jr., and Shirley L. Happ, his wife, Defendants herein, by their attorney, Herbert D. Morrison, and answers Complainants' Bill of Complaint as follows:

- 1. That Defendants admits the allegations in Paragraph "FIRST" of Complainants' Bill of Complaint, but have not verified the dimensions of the property stated therein.
- 2. That Defendants admit the allegations in Paragraph "SECOND" of Complainants' Bill of Complaint.
- That Defendants admit the allegations contained in Paragraphs "THIRD", "FOURTH", "FIFTH", and "SIXTH", of Complainants' Bill of Complaint, but have not personally verified the dimensions and boundaries set forth therein.
- 4. That Defendants admit the allegations contained in Paragraph "SEVENTH" of Complainants' Bill of Complaint.
- 5. That Defendants admit the allegations made in Paragraphs "EIGHTH", "NINTH", "TENTH", "ELEVENTH", "TWELFTH", "THIRTEENTH" and "FOURTEENTH" of Complainants' Bill of Complaint, but do not have sufficient facts to verify the exact dimensions called for on the exhibits attached to the Complaint.
- 6. That Defendants deny the allegations in Paragraph "FIFTEENTH" of Complainants' Bill of Complaint and state affirmatively that any and all property in question was possessed openly, exclusively and hostilely by Respondents and their predecessors in title from the time the said property was deeded to Robert G. Carter, et ux and William A. Landvoigt, et ux (1946,7 and 1948) and even prior thereto.